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December 29, 2020

VIA ECF

The Honorable George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 SO ORDERED:

Beorge B Daniels, U.S.D.J.

Dated:

1 0 6 202**1/**

Re: United States v. Alhassan Iddris Lari 20-cr-143 (GBD)

Dear Judge Daniels:

Please recall that I represent Mr. Alhassan Iddris Lari in his defense of the above-referenced matter. I write to request a change in Mr. Lari's current bail conditions to permit him to travel into the Northern District of New York and the District of Connecticut during his working hours. I have consulted with the Government and United States Pre-trial Services (PTS) Officer Rena Bolin, who both have no objection to this request.

Currently, Mr. Lari is at liberty on a \$50,000 personal recognizance bond (PRB) set before Magistrate Judge Kevin Nathaniel Fox on March 3, 2020. The bond is secured by three co-signers with travel restricted to the Southern and Eastern Districts of New York. He surrendered all travel documents and has not made and will not make any applications for new travel documents. Mr. Lari is also required to report to PTS and submit to mandatory drug testing which, if positive, could add a condition of drug testing/treatment to the bond. Lastly, Mr. Lari is required to continue his employment. On March 12, 2020, Your Honor modified Mr. Lari's bail to add the condition of home detention except for work daily from 4:00 p.m. to 4:00 a.m. and for religious services on Fridays from 12:00 p.m. to 2:00 p.m. Your Honor also placed Mr. Lari on location monitoring and instituted a curfew of 7:00 a.m. to 2:00 p.m.

On September 8, 2020, upon request of the defense, Your Honor modified Mr. Lari's bail to permit him to travel to into the District of New Jersey during working hours.

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Mr. Lari drives a yellow cab that he rents from the Long Island Queens Medallion at 21-02 44th Avenue, Long Island City, New York 11101. Mr. Lari advised that he is currently turning down approximately five fares per week because they require travel either into the Northern District of New York or the District of Connecticut. If granted permission as requested, Mr. Lari's travel within the Northern District of New York and District of Connecticut would be limited to dropping off passengers from time to time.

Mr. Lari thanks Your Honor for your consideration of this request.

Respectfully submitted,

Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Mitzi Steiner (via ECF) A.U.S.A. Caroline Lefever (via ECF) U.S.P.O Rena Bolin (via ECF) Mr. Alhassan Iddris Lari (via email)